

Wexford Golf Club Data Protection Policy

1 The General Data Protection Regulation (GDPR), in effect from 25th May 2018, regulates how personal data is processed in accordance with an EU citizen's Fundamental Rights. It is important that members of the Club are aware of their specific rights and how the Club respects those rights in using (processing) personal data. Simply and as an example, each time a person's email address or postal address is recorded, manually or by an automated system, that piece of their data is being processed. Processing any personal must be lawful for those who do so. The GDPR sets down the rules that apply for it to be lawful and spells out the rights of those whose data is being processed (used).

2 The Club stores and uses personal data received from its members in the course of administering the affairs of the Golf Club. It also engages 3rd Parties to assist in administration of its affairs and allows them to process personal data of members as appropriate for their services to the Club. Each member controls their personal data and have rights in relation to whom, how, when and where it may be used.

3 It is useful to recall the Objects of Wexford Golf Club as defined by its Constitution:

"Provide facilities for the playing and promotion of the Amateur game of golf by men, women, students and juveniles and generally promote amateur games and other social activities amongst its members"

This purpose sets the contours of the legitimate interests pursued by the Club and what is necessary in relation to processing personal data. In accepting membership, a member agrees to be bound by the Constitution and Rules of the Club. If the Club were to engage in activity outside the scope of its purpose and it entailed processing member's data it would need explicit consent for that processing.

4 **Your control** over personal data includes your rights to;

Access the information held and the purposes and modalities of its use,
Have your data rectified if inaccurate,
Have it erased in certain circumstances,
Restrict the use of your data in certain circumstances set down,
Transfer your data to others,
Object to processing of your data for particular reasons,
Cessation of use of your data for direct marketing.

It is the Club's policy to respect member's rights in regard to use (processing) of their personal data in its possession, directly or by engagement with 3rd Parties.

5 The personal data of members which the Club holds and processes directly include; *name, address, email address, date of birth, phone numbers, golf handicap and history of handicap, category of membership, membership number, annual subscription payment and method of payment, data on participation in golf competitions, photographs in Club events.*

6 Processing of your data by the Club are in accordance with Article 6.1(f) of the GDPR and are necessary for the legitimate interests of the Club and for its objects as set down in its Constitution. This includes the following purposes; administration of your annual subscription of membership and category and insurance; administration of your golf playing record and handicapping and publication of golf results; for participation in inter-club competitions; for participation in Club social events, promotions and offer of services in the Restaurant and Pro-shop and information circulars about Club affairs. Your rights in regard to these are as set down in para. 4

3rd Party processing of your data.

7 For efficient and effective administration of certain matters the Club uses 3rd Parties to provide services on behalf of the Club to process some data of the members. For example;

- (a) The BRS golf booking system is administered on the Clubs behalf by a 3rd Party, BRS Golf, a company established in Belfast. Members data, particularly, email addresses are processed for the purpose of effective operation of the golf timesheet booking system. This service is also used to relay Club information e.g. Course conditions and information on Club events and Club newsletters.
- (b) The services of Handicap Master Ltd, a company established in Cheshire, United Kingdom are used to administer the Men's and Ladies golf handicap system. Their proprietary system, Handicap Master incorporates CONGU rules on handicapping
- (c) The service of Smart Club Solutions a company established in Downpatrick, Co. Down are used to administer the till system and membership administration.
- (d) The GUI & ILGU obtain member data in relation to results in golf competitions and handicap records for the purpose of proper administration by them of the CONGU golf handicapping system.

8 The Club similarly considers that current processing of your data by 3rd Parties, for the particular purpose they are engaged, is in accordance with the Regulations of the GDPR and is necessary for the legitimate interests of the Club and for its objects as set down in its Constitution. Your rights, as cited in para. 4, are equally applicable in relation to your data processed by 3rd Parties and they are equally bound by the regulations of the GDPR.

Processing of Data of Children

9 The GDPR equally applies to Youth members and children and their data protection rights are equal to those of adult members as set out above .

Visitors Data

10 When a non-member books a tee time via the BRS system they become a member for the day and they are bound by the appropriate rules of the club in regard to processing personal data e.g. maintaining handicap records, correspondence in relation to booking transaction. Visitor's data protection rights are equal to member's data protection rights and the Club equally pursues its legitimate interests when processing a visitor's data.

11 While the data provided for a transaction of booking a line using a credit card is data processing for the purpose of completing a contract and thus exempt for the purpose of establishing the legality of processing under Art 6.1(b) of GDPR, a visitor's data protection rights otherwise are the same as those referred to in para. 4 above.

12 You may receive requests from 3rd Parties for your consent to continue using your email address to receive certain communication from them or marketing offers. You have a right to withdraw your consent for any of these but before doing so you should review whether you are cutting off receipt of useful or valuable information for your golf.

13 It is the Club policy to comply with its obligations under GDPR and to respect the rights of members and visitors in regard to the protection of their personal data as set out above and to use personal data to the minimum extent while ensuring efficient and appropriate administration of the Club objects and purpose.

Queries relating to processing (use) of your data may be made, preferably by email to the Data Protection Officer, Hon Secretary, David Farrell at info@wexfordgolfclub.ie